

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13

Lakeisha Horne : NO. 22-12912-mdc

OBJECTION TO CERTIFICATE OF DEFAULT AND CERTIFICATE OF SERVICE

Debtor, by her counsel, objects to the certificate of default and requests the Court not enter a relief order and to please hold a hearing due to the following:

The Debtor objects to the Certificate of Default as she has the funds to pay the mortgage up to date in full, but is not supposed to deliver it to the Mortgage Company's local counsel and is supposed to mail it direct to the mortgage company.

The Debtor is also current with the Chapter 13 Trustee and requests that the Court not enter a relief order in this case.

/s/David M. Offen  
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A copy of this Objection is being served on MARK A. CRONIN, Esquire and the Chapter 13 Trustee.

/s/ David M. Offen  
David M. Offen  
Attorney for Debtor